

1 JAIDEEP VENKATESAN, SBN 211386
jvenkatesan@be-law.com
2 PETER SOSKIN, SBN 280347
psoskin@be-law.com
3 BERGESON LLP
4 111 N. Market Street, Suite 600
San Jose, California 95113
Telephone: (408) 291-6200
5 Facsimile: (408) 297-6000

6 Attorneys for Defendants
7 SECRET WATERFALL LLC,
LAUNCELOT A. DEVault, AND
TARAH A. UHRICH

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

12 RAINBOW S.p.A.,
13 Plaintiff,
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15 v.
16 SECRET WATERFALL LLC,
17 LAUNCELOT A. DEVault,
TARAH A. UHRICH, STARLINE
MEDIA, INC., AND DAVID
NDALAMBA,
18 Defendant.

Case No. 5:25-0597-MRA(DTBx)

**DEFENDANTS' STATEMENT
REGARDING PLAINTIFF'S
MOTION FOR LEAVE TO AMEND
COMPLAINT**

Judge: Hon. Monica Ramirez Almadani
Crtrm.: 10B

1 Defendants Secret Waterfall LLC, Launcelot A. Devault and Tarah Uhrich
2 (collectively “Defendants”) hereby submit the following statement regarding
3 Plaintiff’s Motion for Leave to Amend Complaint.

4 Defendants do not, in principle, oppose Plaintiff’s motion for leave to file a
5 Second Amended Complaint. Dkt. 17. In filing this statement, Defendants do not
6 waive any defense, or their right to challenge the sufficiency of the pleadings
7 themselves.

8 Plaintiff’s proposed Second Amended Complaint, however, contains over
9 1,400 paragraphs, and is 371 pages long. Dkt. 17-1. The proposed Second Amended
10 Complaint contains 75 counts, including 69 counts of copyright infringement
11 relating to separate copyrights. *Id.* In view of the number of counts and copyrights at
12 issue, Defendants respectfully request forty-five days to respond to Plaintiff’s
13 Second Amended Complaint.

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16 Dated: July 7, 2025

BERGESON LLP

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By: /s/ Jaideep Venkatesen
Jaideep Venkatesan

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Attorneys for Defendants
SECRET WATERFALL LLC,
LAUNCELOT A. DEVAULT, AND TARAH
A. UHRICH

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